

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

**GTCR BC HOLDINGS, LLC, and
SURMODICS, INC.,**

Defendants.

Case No. 1:25-cv-02391

Hon. Jeffrey I. Cummings

**JOINT MOTION FOR ENTRY OF [PROPOSED] JOINT STIPULATED CASE
MANAGEMENT ORDER AND RESOLUTION OF AREAS OF IMPASSE**

Pursuant to Federal Rule of Civil Procedure 26(f), Plaintiff Federal Trade Commission (“FTC” or “Commission”) has met and conferred with Defendants GTCR BC Holdings, LLC (“BC Holdings”) and Surmodics, Inc. (collectively, “Defendants”) in regards to a Case Management Order. The parties have agreed on most elements of a [Proposed] Joint Stipulated Case Management Order, attached below, but disputes remain as to three issues. With regard to those issues, the parties have embedded the disputed language in the body of the [Proposed] Joint Case Management Order in **bold** text and included short statements with each side’s positions following the disputed language. The parties respectfully request that the Court resolve those three areas of impasse and enter the attached [Proposed] Joint Stipulated Case Management Order. The parties are prepared to answer any questions the Court may have at the telephonic status hearing scheduled for April 17, 2025.

Dated: April 15, 2025

Respectfully submitted,

/s/ Maia Perez

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